

### Remarks

Reconsideration of this application as amended is respectfully requested.

Claims 1, 2, 4, 5, 7-11, 14, 16, 18, 19, and 21 stand rejected under 35 U.S.C. §102(a) in view of U.S. Patent Publication 2003/0210886 of *Li et al.* ("*Li*").

Claims 3, 6, 13, 15, 20, and 22 stand rejected under 35 U.S.C. §103(a) in view of *Li* and U.S. Patent Publication 2004/0125877 of *Chang et al.* ("*Chang*").

Claims 12 and 17 stand rejected under 35 U.S.C. §103(a) in view of *Li* and U.S. Patent No. 6,711,587 of *Dufaux* ("*Dufaux*").

It is respectfully submitted that amended claim 1 is not anticipated by *Li* because *Li* does not disclose extracting a set of key-frames from a video by selecting a set of candidate key-frames from the video and then arranging the candidate key-frames into a set of clusters and selecting one of the candidate key-frames from each cluster as claimed in amended claim 1. Instead, *Li* teaches arranging a video into scenes and shots (*Li*, paragraphs 28-29) and then selecting key-frames from the shots. (*Li*, Abstract).

The examiner has stated that the scenes and shots of *Li* are clusters of candidate key-frames. (Pages 2-3, Office Action, 10/29/08). Applicant respectfully submits that the scenes and shots of *Li* are not clusters of candidate key-frames as claimed in amended claim 1 because the scenes and shots of *Li* comprise all of the video frames of a video. (See Figure 1a of *Li*). *Li* explicitly states that a shot is "a series of individual frames" that are "captured during a continuous shooting period" (*Li*, paragraph 28). In contrast, the clusters of amended claim 1 contain only candidate key-frames and the candidate key-frames comprise only a selected subset of the video frames of a video.

In further contrast, *Li* does not teach selecting one of the candidate key-frames from each cluster as claimed in amended claim 1. Instead, *Li* teaches that different scenes and shots yield a greater or a fewer number of key-frames depending on the relative importance of the scenes and shots. (*Li*, paragraph 29).

Given that claims 2-13 depend from amended claim 1, it is submitted that claims 2-13 are not anticipated by *Li*.

It is further submitted that amended claim 14 is not anticipated by *Li*. Amended claim 14 is a key-frame extraction system that includes limitations similar to the limitations of amended claim 1. Therefore, the remarks stated above with respect to amended claim 1 and *Li* also apply to amended claim 14.

Given that claims 15-22 depend from amended claim 14, it is submitted that claims 15-22 are not anticipated by *Li*.

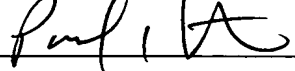
Applicant submits that claims 3, 6, 13, 15, 20, and 22 are not obvious in view of *Li* and *Chang* because *Li* and *Chang* do not teach or suggest extracting a set of key-frames from a video by selecting a set of candidate key-frames from the video and then arranging the candidate key-frames into a set of clusters and selecting one of the candidate key-frames from each cluster as claimed in amended claims 1 and 14 from which claims 3, 6, 13, 15, 20, and 22 depend. Applicant has shown that *Li* does not disclose the limitations of amended claims 1 and 14. *Chang* merely discloses key-frames for shots that share a common theme (*Chang*, paragraph 190) rather than extracting key-frames as claimed in amended claims 1 and 14.

Applicant also submits that claims 12 and 17 are not obvious in view of *Li* and *Dufaux* because *Li* and *Dufaux* do not teach or suggest extracting a set of key-frames from a video by selecting a set of candidate key-frames from the video and then arranging the candidate key-frames into a set of clusters and selecting one of the candidate key-frames from each cluster as claimed in amended claims 1 and 14 from which claims 12 and 17 depend. Applicant has shown that *Li* does not disclose the limitations of amended claims 1 and 14. *Dufaux* teaches examining all video frames in a video for the one having the most faces (*Dufaux*, col. 2, lines 5-7) rather than selecting a set of candidate key-frames from the video and then arranging the candidate key-frames into a set of clusters and selecting one of the candidate key-frames from each cluster as claimed in amended claims 1 and 14.

It is respectfully submitted that in view of the amendments and arguments set forth above, the applicable objections and rejections have been overcome.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 08-2025 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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